

MEMO ENDORSED

June 15, 2021

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VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: ***United States v. Michael Rose, 21 Cr. 224 (VEC)***
Request for Modification of Bail Conditions

Dear Judge Caproni:

We represent defendant Michael Rose in the above-captioned matter. We write on behalf of Mr. Rose to respectfully request that the Court modify the conditions of bail imposed on Mr. Rose, upon consent of the parties.

Mr. Rose is the president of Forsythe Cosmetics Group. Prior to his arrest, Mr. Rose would often travel domestically to meet with clients and prospective clients, attend trade shows and conventions, and meet with suppliers and other parties in the normal course of business. The bail conditions imposed upon Mr. Rose currently prohibit him from traveling outside the jurisdictions of the Southern and Eastern Districts of New York, except for certain travel to his young son's hockey tournaments (as previously approved by the Court). Mr. Rose now asks that the Court modify his conditions of release to permit him to travel within the contiguous United States for purposes of business and family-related travel, upon one week's prior notice to the United States Attorney's Office and to the United States Probation Office.

Assistant U.S. Attorney Samuel Adelsberg and Mr. Rose's supervising officer, U.S. Probation Officer Elizabeth A. Ogilvie, have informed counsel that they do not object to this modification request, provided that Mr. Rose share the particulars of his travel itineraries and the purpose for the travel with AUSA Adelsberg and USPO Ogilvie, one week prior to any travel. Mr. Rose will comply with any relevant COVID-related orders in effect at that time.

Honorable Valerie E. Caproni
June 15, 2021

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/ Theo Takougang

M. Theodore Takougang

cc: AUSA Samuel Adelsberg (via ECF)
P.O. Elizabeth A. Ogilvie (via e-mail)

Application GRANTED.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Valerie Caproni", is written over the typed name.

6/16/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE